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Attorneys for Defendants Bruce Addington and
Cornerstone Industrial Minerals Corporation U.S.A.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
MEDFORD DIVISION

LRY, LLC dba LAKE RAILWAY, an
Oregon LLC; and **FR, LLC**, a Washington
LLC,

Plaintiffs,

v.

LAKE COUNTY, a political subdivision of
the State of Oregon, **BRUCE ADDINGTON**,
individually; and **CORNERSTONE**
INDUSTRIAL MINERALS
CORPORATION U.S.A., an Oregon
corporation,

Defendants.

No. 1:17-cv-00675-MC

**DECLARATION OF ADAM M.
STARR IN SUPPORT OF
ADDINGTON AND
CORNERSTONE'S MOTION
FOR LEAVE TO FILE
DOCUMENT UNDER SEAL**

I, Adam M. Starr, declare:

1. I am one of the attorneys representing Bruce Addington and Cornerstone Industrial Minerals Corporation, U.S.A (collectively "Defendants"). The following statements are true and, if called upon, I could competently testify to the facts averred herein.

2. **Exhibit 2** to the Declaration of John "Tre" Kennedy in Support of Addington and Cornerstone's Motion for Plaintiffs to Return or Destroy Privileged Document is an attorney-

client email communication between Defendants' attorney (John Heffner) and Bruce Addington (Cornerstone's President), and Bobbie Hickey, Mark Morse, and Erik Addington (Cornerstone managers), that was inadvertently produced by Defendants.

3. Defendants' Motion for Leave to File Document Under Seal is filed in good faith and not for any improper purpose.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 9th day of October, 2018.

s/ Adam M. Starr
Adam M. Starr, OSB #125393

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